

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

FIRST-CLASS MAIL AND PERIODICALS  
SERVICE STANDARD CHANGES, 2021

Docket No. N2021-1

**RESPONSE OF THE UNITED STATES POSTAL SERVICE INSTITUTIONAL  
WITNESS (SHARON OWENS) TO QUESTION 3(b) OF PUBLIC REPRESENTATIVE  
FIRST INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS  
TO UNITED STATES POSTAL SERVICE WITNESS ROBERT CINTRON  
(PR/USPS-T1-3(b))  
(May 26, 2021)**

The United States Postal Service hereby provides the response of institutional witness Sharon Owens to Question 3(b) of Public Representative First Interrogatories and Requests for Production of Documents to United States Postal Service Witness Robert Cintron (PR/USPS-T1-3(b)), issued on May 19, 2021. The question is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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May 26, 2021

**RESPONSE OF UNITED STATES POSTAL SERVICE INSTITUTIONAL WITNESS  
OWENS TO PUBLIC REPRESENTATIVE INTERROGATORIES (REDIRECTED  
FROM WITNESS CINTRON)**

**PR/USPS-T1-3(b).** Please confirm whether the Postal Service has considered a dropship discount. If confirmed, please provide:

- i. An estimated discount;
- ii. An explanation of how it was derived;
- iii. And any potential cost/revenue impacts.

**RESPONSE:**

Confirmed in part and not confirmed in part. It is unclear what information is sought in asking “whether the Postal Service has considered a dropship discount.” The Postal Service has considered dropship discounts through some dialogue with the industry in the past, but the Postal Service did not pursue offering such discounts in 2021. In the present case, the Postal Service is not seeking an advisory opinion about pricing.